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Attorney for Proposed Intervenors

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION—LOS ANGELES**

YITZCHOK FRANKEL;  
 JOSHUA GHAYOUM;  
 EDEN SHEMUELIAN, and  
 DR. KAMRAN SHAMSA

Plaintiffs,

vs.

REGENTS OF THE UNIVERSITY OF  
 CALIFORNIA; MICHAEL V. DRAKE,  
 President of the University of California;  
 GENE D. BLOCK, Chancellor, University  
 of California, Los Angeles; DARNELL  
 HUNT, Executive Vice-President and  
 Provost; MICHAEL BECK,  
 Administrative Vice Chancellor;  
 MONROE GORDEN, JR., Vice  
 Chancellor; and RICK BRAZIEL,  
 Assistant Vice Chancellor, each in both  
 his official and personal capacities,

Defendants.

) Case No. 2:24-cv-04702-MCS-

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) **DECLARATION OF ROE 1 IN**

) **SUPPORT OF MOTION FOR**

) **LEAVE TO INTERVENE**

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) **Judge: Hon. Mark C. Scarsi**

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I, ROE 1, declare as follows:

1. This declaration is submitted in support of Proposed Intervenor's Motion for Leave to Intervene.

2. I am over the age of 18 and am capable of making this declaration pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the contents of this declaration.

3. I am a first-year student at UCLA. I have been involved in pro-Palestinian protest since October 7, 2023.

4. I am deeply concerned about how the Frankel injunction mixes up anti-Zionism and antisemitism. I worry that all pro-Palestinian protests will be banned.

5. I have been at protest since the issuance of the Court's Preliminary Injunction on August 18, 2024.

6. I know that protest has been limited to a very small section of UCLA's campus. It feels like we can't protest at all.

7. I was present when UCPD police responded quickly, in large numbers, and in riot gear in response to an action on March 19, 2025. The building was still open during the protest. All classrooms were accessible. No one attempted to block entry to the building. No one was blocked access to the patio based on their faith, nor were there any allegations of anyone being blocked on that basis.

8. I am worried that my private disciplinary records will be shared with the plaintiffs in violation of FERPA laws because of the agreement UCLA entered into with the Frankel plaintiffs.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 2nd day of May, 2025, at Los Angeles, California.

/s/ Roe 1

Roe 1